

DOCKET SECTION  
BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF NASHUA, DISTRICT, MYSTIC & SEATTLE  
REDIRECTED FROM WITNESS FRONK  
AND MOTION FOR LATE ACCEPTANCE  
(NDMS/USPS-T32-44 AND 45)**

The United States Postal Service hereby files its responses to the following interrogatories of Nashua, District, Mystic & Seattle, dated September 4, 1997: NDMS/USPS-T32-44 and 45.

Each interrogatory is stated verbatim and is followed by the response.

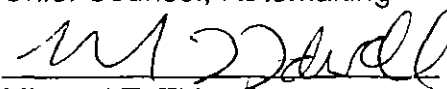
These responses were due to have been filed on September 18, 1997. The need to consult with various departments within headquarters made it impossible to file timely responses. The Postal Service regrets the delay in these responses and has attempted to mitigate its impact by sending copies to NDMS counsel by facsimile today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202)268-2998/FAX: -5402  
September 26, 1997

RESPONSE OF U.S. POSTAL SERVICE TO INTERROGATORIES OF NDMS  
REDIRECTED FROM WITNESS FRONK

NDMS/USPS-T32-45. Please provide the volume of First-Class parcels by ounce increment for Base Year 1996.

RESPONSE: The approximate number of parcels by ounce increment appears below. The ounce distribution of pieces below is only approximate and is based on 1996 mailing statement data and domestic RPW data for single-piece mail. First-Class Mail is overwhelmingly letters and there are relatively few parcels, especially in the presort mail category where the underlying mailing statement data show relatively small volumes. Note that the 1996 volume of parcels weighing one ounce or less (41.4 million) is different than the figure of 27.2 million parcels nonstandard parcels provided in response to NDMS/USPS-T32-29. *Since one-ounce parcels are nonstandard by definition, one would expect these two numbers to be about the same.* This difference may be due to postal personnel not recognizing a piece as nonstandard during acceptance or data collection. It may also be due to a shape misclassification on a mailing statement that is not caught during acceptance. Since the First-Class parcel data are relatively "thin," the impact of any possible misclassification is magnified in the data.

<u>Ounce Increment</u>	<u>Parcel Volume (millions)</u>
0-1	41.4
1-2	77.7
2-3	78.6
3-4	56.7
4-5	45.4
5-6	37.4
6-7	31.1
7-8	27.7
8-9	24.8
9-10	21.0
10-11	17.3

RESPONSE OF U.S. POSTAL SERVICE TO INTERROGATORIES OF NDMS  
REDIRECTED FROM WITNESS FRONK

NDMS/USPS-T32-44.

- a. Please provide the volumes of First-Class nonstandard (i) letters, (ii) flats, and (iii) parcels for each year since FY 1980.
- b. Please provide the volume of First-Class nonstandard nonpresort letters, as a percentage of total First-Class single-piece letters, for each year since FY 1980.
- c. Please provide the volume of First-Class nonstandard presort flats, as a percentage of total First-Class single piece flats, for each year since FY 1980.
- d. What efforts has the Postal Service undertaken to determine the effectiveness of the nonstandard surcharge since FY 1980 at encouraging mailers to reduce the volume of nonstandard letters and flats. Please explain in full, including a description of surveys and other data collected, as well as any determinations made by the Postal Service.

RESPONSE:

(a) Data by shape for nonstandard pieces are available only for 1994-1996. Please recognize that these data are only an approximation. The approximate 1996 data were provided in response to NDMS-T32-29(a)-(b). Total pieces for FY 1994 and FY 1995 were taken from the 1994 and 1995 billing determinants, respectively. The distribution of pieces by shape below is approximate and is based on mailing statement data and domestic RPW data.

Nonstandard Volume (millions)				
	<u>All</u>	<u>Letters</u>	<u>Flats</u>	<u>Parcels</u>
1995	355.4	51.5	286.9	17.0
1994	306.7	48.6	243.8	14.3

(b) The data are available for 1994-1996:

FY 94	0.16%
FY 95	0.09%
FY 96	0.13%

RESPONSE OF U.S. POSTAL SERVICE TO INTERROGATORIES OF NDMS  
REDIRECTED FROM WITNESS FRONK

RESPONSE to NDMS/USPS-T32-44 (continued)

(c) The data are available for 1994-1996.

FY 94	10.54%
FY 95	6.36%
FY 96	6.18%

(d) No such efforts have been undertaken. Also, see response to NDMS/USPS-T32-25.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "M. T. Tidwell", written over a horizontal line.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1145  
September 26, 1997